ATTACHMENT G

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May 27, 2020

Magistrate Judge Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

        Re: <u>Gursewak Singh v Lintech Electric Inc., et al</u>
                United States District Court EDNY 18 CV5780

Dear Magistrate Gold:

        The plaintiff requests leave for a pre-motion conference concerning defendants' refusal and frivolous and obstructive tactics attempting to prevent to thwart plaintiff obtaining certain discovery as described below.

        This FLSA case involves highly disputed claims that plaintiff worked full time for defendants over years as an electrician at NYCHA public work projects but was only paid in cash while defendants claim plaintiff worked a few hours most weeks and in limited periods and was paid by checks that were received and cashed.

        Plaintiff denies ever receiving, endorsing or cashing any checks issued by defendants.

        Defendants were served with discovery demands last year and refused to comply with those demands making such obstructive objections such as the following:

                Object to providing the identity of the name and address of any person who performed any bookkeeping or accounting activity for defendants....during the relevant employment period of the plaintiff.

                Object to providing copies of **"NYS-45 and "Federal 941"** documents on the grounds that those terms are "vague and ambiguous"

     Object to answering questions using the phrase **"required to make payment"** at prevailing wages for defendants' employees working at NYCHA locations... because that phrase is "vague and ambiguous"

     The specific discovery demands made and defendants objections as stated are all set forth in my letter of May 23, 2020 (Attachment 1) which the defendants' counsel has ignored.

     In view of the pending June 15 conference it is requested that these issues be addressed either before then at a separate conference or at that time.

        Respectfully submitted,

        JONATHAN SILVER

JS/eb